

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

THE CONNOR GROUP, A REAL )  
ESTATE INVESTMENT FIRM, LLC )  
Plaintiff, ) Case No.  
v. )  
JENNIFER MORENO, et. al. )  
Defendants. )

## ***NOTICE OF REMOVAL***

TO THE JUDGES OF THE UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF OHIO, WESTERN DIVISION:

1. On June 10, 2024, Plaintiff The Connor Group, A Real Estate Investment Firm, LLC (“Plaintiff”), commenced an action in the Montgomery County Court of Common Pleas, Ohio, bearing Case No. 2024CV03258 and captioned *The Connor Group, A Real Estate Investment Firm v. Jennifer Moreno et. al.* praying damages and injunctive relief against Defendants Jennifer Moreno, Tina Austin, Megan Hedrick, Marc Vo, Jennifer Nelson and Higher Tech Realty FL, LLC.

2. On February 27, 2025, Plaintiff filed an Amended Complaint in the Montgomery County Court of Common Pleas, Ohio, for the purpose of adding Chesley Lewis as a new party Defendant.

3. A copy of the Amended Complaint in this case was served upon counsel for Jennifer Moreno, Tina Austin, Megan Hedrick, Ha Vo a/k/a Marc Vo, Jennifer Nelson and Higher Tech Realty FL, LLC d/b/a Mark Spain Realty on February 27, 2025 pursuant to Ohio R. Civ. Pro 15(A).

4. A copy of the Amended Complaint in this case was served upon new-party Defendant Chesley Lewis on March 10, 2025 via certified mail pursuant to Rule 4.3 of the Ohio Rules of Civil Procedure.

5. This action is wholly of a civil nature, of which this Court has original jurisdiction pursuant to 28 U.S.C. §1332(a)(1), and is one which may be removed to this Court pursuant to the provisions of 28 U.S.C. §1441(a) and (b), as being a civil action involving a claim or claims between citizens of different States seeking monetary damages and nonmonetary injunctive relief. Pursuant to 28 U.S.C. §1446(c)(2)(A) Defendants assert the amount in controversy for all claims to be an amount greater than \$75,000. A copy of the Plaintiff's Amended Complaint is attached to this Notice of Removal and incorporated by reference.

6. Venue is proper in this district pursuant to 28 U.S.C. §1441(a) because the state court where the suit has been pending is located in this district and division.

7. This Notice of Removal is being filed within thirty (30) days after service of the Amended Complaint upon new-party Defendant Chesley Lewis pursuant to 28 U.S.C. §1446(b)(2)(B-C). *See Brierly v. Alusuisse Flexible Packaging, Inc.*, 184 F.3d 527 (6<sup>th</sup> Cir. 1999) (“a later-served defendant has 30 days from the date of service to remove a case to federal court, with the consent of the remaining defendants.”).

8. Defendants attach hereto, and file herewith, a copy of the Summons and Amended Complaint served as aforesaid, as well as copies of all other process, pleadings and orders served upon them.

9. All Defendants join in this Notice of Removal.

WHEREFORE, Defendants pray that the case presenting pending in the Montgomery County Court of Common Pleas against them be removed to this Court and proceed herein according to law.

Respectfully submitted,

FREEMAN MATHIS & GARY, LLP

/s/Cara M. Wright

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*Counsel for Defendants Jennifer Moreno, Jennifer Nelson, Megan Hedrick, Tina Austin, Mark Vo, Chesley Lewis and Higher Tech Realty FL, LLC d/b/a Mark Spain Realty*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Notice of Removal* was filed electronically and served on March 13, 2025 upon to the following via electronic mail:

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